



CONNECTICUT REPUBLICANS

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COMMISSION
2010 OCT 26 PM 3: 15
OFFICE OF GENERAL
COUNSEL

October 25, 2010

VIA HAND-DELIVERY

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR # 6410

Re: Supplemental Complaint Against Richard Blumenthal, Blumenthal for Senate, and Planned Parenthood

Dear Mr. Hughey:

This letter constitutes a supplement to the original complaint dated October 22, 2010 and filed by the Connecticut Republican Party against Richard Blumenthal, the Democratic nominee for United States Senate in Connecticut, Blumenthal for Senate ("Blumenthal Campaign"), Mr. Blumenthal's principal campaign committee, and Planned Parenthood's lobbying and political arm, Planned Parenthood Action Fund, Inc ("Planned Parenthood"), a qualified nonprofit corporation. Since the original complaint was filed, the Connecticut Republican Party has learned additional factual information that further supports its request that the Federal Election Commission ("FEC" or "Commission") conduct an immediate and thorough investigation into the various public communications in which the Blumenthal Campaign and Planned Parenthood may have coordinated.

As set forth in the original complaint, on October 22, 2010, Marcy Stech, a Blumenthal Campaign press staffer, sent an email to several other Blumenthal Campaign staffers stating, "Grossman is looking for misogynistic [sic] photos of women and WWE. Planned Parenthood wants to hit LM hard on it. What do we got?" See Email from Marcy Stech (Oct. 22, 2010) (emphasis added) (attached as Exhibit 1 in the Original Complaint).

As set forth in the original complaint, the "Grossman" referenced in the email is Andrew Grossman, a Democratic consultant who, upon information and belief, is an agent of Planned Parenthood. See Position Description: Political and Organizing Director, Planned Parenthood Federation of America, <http://www.grossmansolutions.com/PPFA.pdf> (attached as Exhibit 3 in the Original Complaint).

321 Ellis Street • Bldg 17 Unit 501 • New Britain, CT 06051

Telephone: (860) 826-7378 • Fax: (860) 826-2742 • Website: www.ctgop.org

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As set forth in the original complaint, on October 16, 2010, Planned Parenthood began an independent expenditure mail campaign in opposition to Linda McMahon, the Republican nominee for United States Senate in Connecticut and Mr. Blumenthal's opponent. See 24-Hour Notice, Planned Parenthood Action Fund, Inc., Oct. 15, 2010, <http://query.nictusa.com/cgi-bin/dcdav/forms/C90005471/501605/f57> (attached as Exhibit 4 in the Original Complaint).

As set forth in the original complaint, the Blumenthal Campaign and Planned Parenthood's actions meet at least two of the Commission's coordination conduct standards. Mr. Grossman, an agent of Planned Parenthood, reached out to Ms. Stech, a Blumenthal Campaign staffer, and specifically asked for the Blumenthal Campaign to assist him in finding images to use in a communication opposing Linda McMahon, Blumenthal's opponent. Mr. Grossman, as Planned Parenthood's agent, suggested that Planned Parenthood create, produce, or distribute a communication and the Blumenthal Campaign assented by willingly looking for images to provide to Planned Parenthood. See 11 C.F.R. § 109.21(d)(1). By assenting Mr. Grossman in finding images for the communication, the Blumenthal Campaign was also materially involved in the content of the communication. See 11 C.F.R. § 109.21(d)(2).

On October 22, 2010 – the very same day that Blumenthal Campaign agents assented to Planned Parenthood's suggestion that the organization disseminate public communications opposing Linda McMahon and the very same day that Blumenthal Campaign agents were materially involved in the content of the public communications opposing Linda McMahon – Planned Parenthood continued its independent expenditure mail campaign in opposition to Linda McMahon. See 24-Hour Notice, Planned Parenthood Action Fund, Inc., Oct. 22, 2010, <http://query.nictusa.com/cgi-bin/dcdav/forms/C90005471/510211/f57> (attached as Exhibit 5).

Planned Parenthood continued its independent expenditure campaign in opposition to Linda McMahon despite the organization's failure to maintain independence from the Blumenthal Campaign and despite the fact that the national media had discovered and reported on the coordinated conduct between the Blumenthal Campaign and Planned Parenthood, see Ben Smith, Blumenthal and Planned Parenthood Seek 'Worst of WWE + Women Photos,' *Politico*, Oct. 22, 2010, http://www.politico.com/blogs/bensmith/1010/Blumenthal_and_Planned_Parenthood_seek_Worst_of_WWE_women_photos.html (attached as Exhibit 2 in the Original Complaint).

For the foregoing reasons, the Connecticut Republican Party renews its request for the Commission to conduct an immediate and thorough investigation into the entire range of public communications in which the Blumenthal Campaign and Planned Parenthood may have illegally coordinated and impose the maximum penalty under the Act for any legal violations that occurred.

The above is correct and accurate to the best of my knowledge, information, and belief.

Sincerely,



Christopher C. Healy

Chairman

Connecticut Republican Party

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Attachment

SWORN TO AND SUBSCRIBED before me on this 25th day of October, 2010. *at New Britain, Ct.*

Michael Argento
Notary Public

My commission expires:

NOTARY PUBLIC
MY COMMISSION EXPIRES AUG 31 2012

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Exhibit 5



FEC FORM 5

REPORT OF INDEPENDENT EXPENDITURES MADE AND CONTRIBUTIONS RECEIVED

FILING FEC-510211

1. Planned Parenthood Action Fund Inc.

434 West 33rd Street
New York, NY 10001

2. Filer Information

This Filer IS a Qualified Nonprofit Corporation.

3. FEC Committee ID #: C90005471

- 4. (a) Type Of Report: 24-Hour Report**
(b) This Report Is NOT An Amendment

5. Covering Period: Through

ITEMIZED INDEPENDENT EXPENDITURES

6. Total Contributions: 0.00

7. Total Independent Expenditures: 49725.90

Completed By: Deirdre Schifeling
Date Signed: 10/22/2010

(End FEC FORM 5)



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SCHEDULE 5-E

ITEMIZED INDEPENDENT EXPENDITURES

FILING FEC-510211

Committee: PLANNED PARENTHOOD ACTION FUND INC.

Stones' Phones

1309 F Street NW Ste 200
Washington, DC 20004

Expenditure Description: Get out the vote calls
Date Expended = 10/21/2010
In SUPPORT of Michael Bennet

Amount Expended = 16508.00
Calendar YTD Per Election for Office Sought = 133928.47

Stones' Phones

1309 F Street NW Ste 200
Washington, DC 20004

Expenditure Description: Get out the vote calls
Date Expended = 10/21/2010
In OPPOSITION to Kenneth Buck

Amount Expended = 16500.00
Calendar YTD Per Election for Office Sought = 133928.47

Mack Crounse Group

2001 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mai
Date Expended = 10/21/2010
In OPPOSITION to Linda McMahon

Amount Expended = 9000.00
Calendar YTD Per Election for Office Sought = 18035.35

Mack Crounse Group

2201 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mai
Date Expended = 10/22/2010
In OPPOSITION to Thomas D Ganley

Amount Expended = 3855.95
Calendar YTD Per Election for Office Sought = 23367.90

IMack Crounse Group

2201 N Beauregard Street Ste 420
Alexandria, Virginia 22311

Expenditure Description: Production and postage for political mai
Date Expended = 10/22/2010
In SUPPORT of Betty Sutton

Amount Expended = 3855.95
Calendar YTD Per Election for Office Sought = 23367.90

The Watershed Company

100 Bush Street Suite 850
San Francisco, California 94104

Expenditure Description: Email Consulting
Date Expended = 10/22/2010
In OPPOSITION to Kenneth Buck

Amount Expended = 14.00
Calendar YTD Per Election for Office Sought = 133928.47

Total of Itemized Independent Expenditures = 49725.90



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